

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3 -----X  
4 AT LAST SPORTSWEAR, INC., )  
5 )  
6 Plaintiff, ) 13 CV 2355 (WHP)  
7 )  
8 v. )  
9 )  
10 MICHAEL KAMENS, )  
11 )  
12 Defendant and Third-Party Plaintiff, )  
13 )  
14 v. )  
15 )  
16 AT LAST SPORTSWEAR, INC., )  
17 BONNI DUCHON, )  
18 SUNIL AHUJA, and )  
19 SANJAY ISRANI, )  
20 )  
21 )  
22 Third-Party Defendants. )  
23 -----X

13  
14  
15  
16 DEPOSITION OF  
17 SANJAY ISRANI  
18 NEW YORK, NEW YORK  
19 SEPTEMBER 10, 2013  
20  
21

22 ATKINSON-BAKER, INC.  
23 COURT REPORTERS  
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REPORTED BY: HELEN SHUM  
FILE NO.: A709980

1 S. ISRANI

2 Q. Have you prepared for today's deposition  
3 prior to today?

4 A. I had a conversation with our attorney a  
5 few days ago, and that's it.

6 Q. Have you brought any documents with you  
7 today?

8 A. No, I have not.

9 MR. ANDREWS: I did want to state for the  
10 record -- this is not a question. It's something  
11 I wanted to state for the record. Mr. Kamens,  
12 the Defendant, just served his request for  
13 production of documents yesterday. We recognize  
14 that there has been no opportunity for you or  
15 anyone else at your company to have responded to  
16 them.

17 Today's deposition will be relatively  
18 short, and the Defendant reserves the right to  
19 continue the deposition at a latter date once  
20 documents are produced. Your attorney may object  
21 to that, and she'll have every opportunity to say  
22 what she wants to say.

23 Your company and you have been served with  
24 a document request. You will have approximately  
25 30 days to respond. Depending on the documents

1 S. ISRANI

2 that are produced, we may seek to continue the  
3 deposition, and that's not a question for you.  
4 That's really directed to your attorney, if  
5 Ms. Windholz wants to respond.

6 MS. WINDHOLZ: Thank you. I appreciate  
7 that. Rule 30 of the Federal Rules of Civil  
8 Procedure expressly provides that depositions are  
9 to be conducted over the course of one day.  
10 Parties are allowed seven hours over one day, not  
11 a series of days, one day in which to conduct the  
12 deposition.

13 You're allowed to take your full seven  
14 hours today, but after today, Mr. Israni's  
15 deposition will be closed. A decision was made  
16 by Mr. Kamens' Counsel to take the Third-Party  
17 Defendant's deposition prior to serving  
18 discovery. That was a decision that was made,  
19 and we're not going to keep this deposition open  
20 pending receipt of the responses to the discovery  
21 request served to us yesterday.

22 Q. Okay. We'll continue with the deposition  
23 now.

24 You testified that you work in the Secaucus  
25 office. Do you maintain an office in more than one